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BEFORE THE TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

T.R.A. DOCKET ROOM

IN RE:

| IMPLEMENTATION OF THE FEDERAL |) | |
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| COMMUNICATIONS COMMISSION'S |) | DOCKET NO |
| TRIENNIAL REVIEW ORDER – 9 MONTH |) | 03-00527 |
| PROCEEDING – LOOP AND TRANSPORT |) | |

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, LLC'S PRELIMINARY OBJECTIONS TO BELLSOUTH'S FIRST SET OF INTERROGATORIES (NOS. 1-13)

AT&T Communications of the South Central States, LLC (hereinafter "AT&T") pursuant to Rules 26.02 and 33.01 of the Tennessee Rules of Civil Procedure, the agreement of the parties, and the Procedural Orders issued by the Tennessee Regulatory Authority ("TRA") in this Docket hereby submits the following Objections and Responses to BellSouth Telecommunications, Inc.'s (hereinafter "BellSouth") First Set of Interrogatories (Nos. 1-13) to AT&T Communications of the South Central States, LLC, as follows:

General Objections

AT&T makes the following General Objections to BellSouth's First Set of Interrogatories Nos. 1-13.

- 1. AT&T objects to BellSouth's First Set of Interrogatories Nos.

 1-13 to the extent that it is overly broad, unduly burdensome, oppressive, not permitted by applicable discovery rules, and would require AT&T to disclose information that is privileged.
- 2. AT&T objects to each and every request and instruction to the extent that such request or instruction calls for information, which is exempt from discovery by virtue of the attorney-client privilege, work product privilege or other applicable privilege.
- AT&T objects to each and every request insofar as the request is vague, ambiguous, overly broad, imprecise, or utilizes terms that are subject to multiple interpretations but are not properly defined or explained for purposes of these requests. Any Responses provided by AT&T in response to BellSouth's requests will be provided subject to, and without waiver of, the foregoing objection.
- 4. AT&T objects to each and every request insofar as the request is not reasonably calculated to lead to the discovery of admissible evidence and is not relevant to the subject matter of this action. AT&T will attempt to note each instance where this objection applies.
- 5. AT&T objects to BellSouth's general instructions, definitions or specific discovery requests insofar as they seek to impose obligations

on AT&T which exceed the requirements of the Alabama Rules of Civil Procedure or Alabama law.

- 6. AT&T objects to providing information to the extent that such information is already in the public record before the Tennessee Regulatory Authority or the Federal Communications Commission ("FCC").
- 7. AT&T's objects to each and every request, general instruction, or definition insofar as it is unduly burdensome, expensive, oppressive, or excessively time consuming as written.
- 8. AT&T objects to each and every request to the extent that the information requested constitutes "trade secrets" which are privileged pursuant to Tennessee Rules of Evidence. To the extent that BellSouth's requests seek proprietary confidential business information which is not the subject of the "trade secrets" privilege, AT&T will make such information available to counsel for BellSouth pursuant to an appropriate Protective Agreement, subject to any other general or specific objections contained herein.
- 9. AT&T is a large corporation with employees located in many different locations in Alabama and in other states. In the course of its business, AT&T creates countless documents that are not subject to Tennessee Regulatory Authority or FCC retention of records

requirements. These documents are kept in numerous locations and are frequently moved from site to site as employees change jobs or as the business is reorganized. Rather, these responses will provide all of the information obtained by AT&T after a reasonable and diligent search conducted in connection with this discovery request. AT&T will comply with BellSouth's request that a search be conducted of those files that are reasonably expected to contain the requested information. To the extent that the discovery request purports to require more, AT&T objects on the grounds that compliance would impose an undue burden or expense.

10. AT&T objects to the definitions of "AT&T" to the extent that such definitions seek to impose an obligation on AT&T Communications of the South Central States, LLC, to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of AT&T Communications of the South Central States, LLC, which is the entity certificated to provide regulated telecommunications services in Tennessee and which is a party to this docket. All references to "AT&T" in responding to

BellSouth's requests should be taken to mean AT&T Communications of the South Central States, LLC.

11.

AT&T objects to the definitions of "you" and "your" to the extent that such definitions seek to impose an obligation on AT&T Communications of the South Central States, LLC to respond on behalf of subsidiaries, affiliates, or other persons that are not parties to this case on the grounds that such definition is overly broad, unduly burdensome, oppressive, and not permitted by applicable discovery rules. Without waiver of its general objection, and subject to other general and specific objections, Answers will be provided on behalf of AT&T Communications of the South Central States, LLC which is the entity certificated to provide regulated telecommunications services in Tennessee and which is a party to this docket. All references to "AT&T" in responding to BellSouth's requests should be taken to mean AT&T Communications of the South Central States, LLC.

SPECIFIC RESPONSES TO INTERROGATORIES

REQUEST: BellSouth First Set of Interrogatories

DATED: October 24, 2003

Interrogatory 1: Affirm or deny that you have self-provided high capacity

transport facilities that you own (i.e., any DS3 or greater facilities, including dark fiber) that provide transport along a route between a pair of ILEC central offices or wire centers in each/any of the nine Southeastern states for use in your own operations. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each central office of the pair and be operationally ready to provide transport into or out of each office of the pair. Answer this question in the affirmative if you are selfproviding such facilities For purposes of this question, you "own" transport facilities if (i) you have legal title to the facility; or (ii) if you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, unbundled network elements or other services or facilities obtained from third parties, should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of

DATED: October 24, 2003

Interrogatory 2: Affirm or deny that you offer to carriers on a wholesale basis

DS1 or higher transport facilities, or dark fiber transport facilities that you own that provide a route between a pair of ILEC central offices or wire centers, to one or more pair of wire centers, in each/any of the nine states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility and are serving customers using the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other services obtained from third parties, should not be included in this

Response: See attached: AT&T Responses to BellSouth's First Set of

response.

DATED: October 24, 2003

Interrogatory 3: Affirm or deny whether you have acquired on a wholesale basis

from a third party (other than the ILEC or a CLEC that is a party to this proceeding) DS1, DS3, or dark fiber transport between two or more ILEC central offices in each/any of the Southeastern states. The facilities must terminate to an active physical or virtual collocation (includes all types of collocation, not just those qualifying under section 251 (c)(6)) at each end of the transport route) associated with each office of the pair and be operationally ready to provide transport into or out of each office in the pair.

Response: See attached: AT&T Responses to BellSouth's First Set of

DATED: October 24, 2003

Interrogatory 4: For each state in Question 1 that you answered in the affirmative

(that you have deployed or self-provide high capacity transport for use in your own operations), provide a list of all the paired ILEC CO to ILEC CO routes on which you have deployed such

facilities identifying:

a. The CLLI codes of the paired ILEC CO locations that make up each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)

- b. Whether your self-provided transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code for the collocation arrangement.
- c. Whether your self-provided transport facilities are provisioned entirely on facilities you own (as defined in Question 1).
- d. If any of your self-provided transport facilities include facilities obtained through third parties (Yes, No); if your response is yes, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are able to immediately provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

BellSouth First Set of Interrogatories

DATED:

October 24, 2003

Interrogatory 5:

For each state in Question 2 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher, or dark fiber capacity transport) provide a list of all ILEC CO to ILEC CO routes along which you provide such transport identifying:

- a. The CLLI codes of the paired ILEC CO locations that make up the end points of each and every route. In each case show the "low alpha" (alphabetically first) CLLI code as Wire Center A and the "high alpha" CLLI code as Wire Center Z. (Provide the full 11 character CLLI.)
- b. Whether your wholesale transport facilities are terminated to collocations (includes all types of collocation, not just those qualifying under section 251 (c)(6) at each end of the transport route). Provide the customer name of record for the collocation arrangement and 11-character ACTL CLLI code of the collocation arrangement.
- c. Whether your wholesale transport services are provisioned entirely on facilities you own (as defined in Question 2).
- d. If any of your self-provided transport facilities include facilities obtained through third parties, indicate the vendor name.
- e. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis. (Yes, No)
- f. Whether you are willing and able immediately to provide transport along the particular route.
- g. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response:

BellSouth First Set of Interrogatories

DATED:

October 24, 2003

Interrogatory 6:

For each state in Question 3 that you answered in the affirmative (that you have acquired on a wholesale basis DS1, DS3 or higher, or dark fiber transport), provide the following in electronic format using the worksheet¹ related to both self-provided (the Question 4 spreadsheet) and wholesale facilities (the Question 5 spreadsheet):

- a. The CLLI codes of the ILEC wire centers or COs of the starting and ending points of the transport routes;
- b. The name of the carrier or company from whom you received or purchased the transport;
- c. Whether you are operationally ready to provide transport using these facilities; and
- d. The capacity deployed and the capacity active on the route as of September 30, 2003.

Response:

DATED: October 24, 2003

Interrogatory 7: If, in response to Questions 4 and 5, you denied any of the

specified characteristics, explain in detail the basis for your

response. For example, if your wholesale operations are affiliated with another provider, state the name of the provider with whom you are affiliated. State also whether there are other limitations on your wholesale operations; if so, describe in detail any such

limitations.

Response: See attached: AT&T Responses to BellSouth's First Set of

DATED: October 24, 2003

Interrogatory 8: Affirm or deny that you have self-provided high capacity loop or

dark fiber facilities that you own (i.e., any DS3 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's

collocation, point of interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states for use in your own operations in

providing retail service to your customers. Answer this question in the affirmative if you are self-providing such facilities. For purposes of this question, you "own" a facility (i) if you have legal title to the facility, or (ii) if it you have obtained dark fiber under a long term (10 or more years) IRU and have attached your own optronics to light the facility and are serving customers using

the facility. Facilities obtained through any other means, including but not limited to, special access, unbundled network elements or other services or facilities obtained from third parties,

should not be included in this response.

Response: See attached: AT&T Responses to BellSouth's First Set of

Bellsouth First Set of Interrogatories

DATED:

October 24, 2003

Interrogatory 9:

Affirm or deny that you offer to carriers on a wholesale basis DS1, DS3 or higher capacity loop facilities or dark fiber that you own (i.e., any DS1 or greater facilities that provide connections between a switch, wire center, collocation, point of interconnection, etc., and a customer's premises) to one or more

interconnection, etc., and a customer's premises) to one or more customer locations in each/any of the nine Southeastern states. Answer this question in the affirmative if you are offering such facilities. For purposes of this question, you "own" a facility if (1) you have legal title to the facility, or (ii) if you have obtained on an unbundled, leased or purchased basis dark fiber and have attached your own optronics to light the facility. Facilities obtained through any other means, including but not limited to special access, other unbundled network elements or other

services obtained from third parties, should not be included in this

response.

Response:

DATED: October 24, 2003

Interrogatory 10: Affirm or deny that you have obtained from a third party (other

than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of retail services to your customers, to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 8 above should not be included in

this response.

Response: See attached: AT&T Responses to BellSouth's First Set of

BellSouth First Set of Interrogatories

DATED:

October 24, 2003

Interrogatory 11:

Affirm or deny that you have obtained from a third party (other than the ILEC or a CLEC that is a party to this proceeding), high capacity loops or dark fiber loops for the provisioning of services on a wholesale basis to one or more customer locations in each/any of the nine Southeastern states. Self-provided facilities that you "own" as defined in 9 above should not be included in

this response.

Response:

BellSouth First Set of Interrogatories

DATED:

October 24, 2003

Interrogatory 12:

For each state in Question 8 and 10 that you answered in the affirmative (that you have self-provided or obtained from a third party other than the ILEC or a CLEC that is a party to this proceeding high capacity loops or dark fiber for use in your own operations in providing retail service to your customers) provide a list of the customer locations to which you have deployed such loops, (in electronic format using the attached spreadsheets) identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc., from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to address such restrictions.
- f. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response:

BellSouth First Set of Interrogatories

DATED:

October 24, 2003

Interrogatory 13:

For each state in Questions 9 and 11 that you answered in the affirmative (that you offer at wholesale DS1, DS3 or higher capacity loops) provide a list of the customer locations to which you have provided such loops (in electronic format using the attached spreadsheets), identifying:

- a. The RSAG valid address of each customer location.
- b. The CLLI code of the location from which the loop is extended to the customer location. (Provide the full 11-character CLLI.)
- c. Indicate whether the facility is wholly owned by you (Yes, No); if no, provide the name of the vendor from whom you have purchased all or a portion of the facilities.
- d. Indicate whether the facility is provided over dark fiber you have obtained from BellSouth on an IRU basis or UNE basis (Yes, No).
- e. Indicate whether or not you have the unrestricted ability to serve all customers at that location if it is a multi-tenant location. (Yes, No, NA). This includes access to all units in the building, access to all buildings in a campus environment and equivalent access to the same minimum point of entry (MPOE), common space, house and riser and other intra building wire as the ILEC. If no, explain in detail any restrictions on your ability to serve customers and explain any and all actions you have taken to eliminate such restrictions.
- f. Indicate whether other carriers have access to these wholesale facilities at a technically feasible point (e.g., manhole, meet point, collocation, etc).
- g. The capacity deployed and capacity activated to the specific location as of September 30, 2003.

Response:

SUBMITTED this day of November, 2003.

BOULT CUMMINGS CONNERS & BERRY

Henry Walker

414 Union Street

Suite 1600

Nashville, TN 37219

(615) 252-2363

Attorney for AT&T Communications of the South Central States, LLC

CERTIFICATE OF SERVICEI

I hereby certify that on November 26, 2003, a copy of the foregoing document was serviced on the parties of record, via US mail:

Martha M. Ross-Bain, Esq. AT&T Communications of the South Central States, LLC 1200 Peachtree Street, Suite 8062 Atlanta, GA 30309

Charles B. Welch, Esq. Farris, Mathews, et. al. 618 Church St., #300 Nashville, TN 37219

Timothy Phillips, Esq.
Office of Tennessee Attorney General
P. O. Box 20207
Nashville, TN 37202

H. LaDon Baltimore, Esq. Farrar & Bates 211 Seventh Ave., N. #320 Nashville, TN 37219-1823

James Wright, Esq. United Telephone – Southeast 14111 Capital Blvd. Wake Forest, NC 27587

Guy Hicks BellSouth Telecommunications, Inc. 333 Commerce St., Suite 2101 Nashville, TN 37201 Ms. Carol Kuhnow Qwest Communications, Inc. 4250 N. Fairfax Dr. Arlington, VA 33303

Jon E. Hastings Boult Cummings Conners Berry, PLC P. O. Box 198062 Nashville, TN 37219-8062

Dale Grimes Bass, Berry & Sims 315 Deaderick St., #2700 Nashville, TN 37238-3001

Mark W. Smith, Esq. Strang, Fletcher, et. al. One Union Square, #400 Chattanooga, TN 37402

Nanette S. Edwards, Esq. ITC^DeltaCom 4092 South Memorial Parkway Huntsville, AL 35802

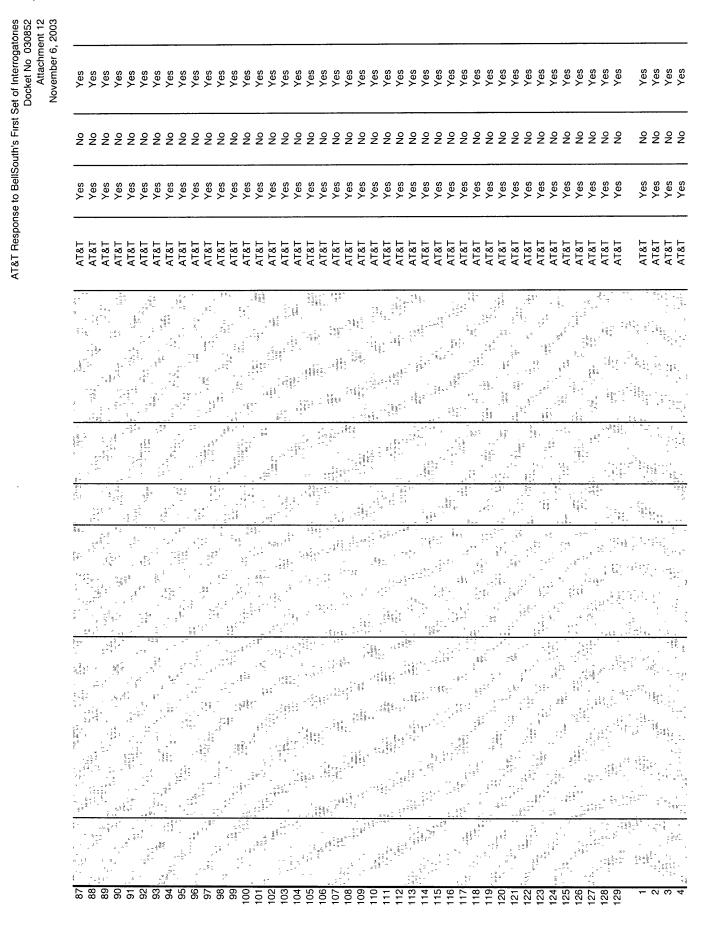
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